



Itaú's Commitment to Human Rights

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Itaú Unibanco's Commitment to Human Rights

1. General Principles

The purpose of this documents is to reinforce Itaú Unibanco Holding S.A.'s commitment to respect for human rights in its relations with employees, clients, suppliers, partners and society. This commitment is guided by the United Nations Guiding Principles on Business and Human Rights, in line with the "Protect, Respect and Remedy" framework expressed in John Ruggie's Final Report, approved by the United Nations Human Rights Council on June 16, 2011.

Itaú Unibanco is committed to respecting human rights as stipulated in the United Nations International Covenants on Human Rights, which are comprised of the United Nations Universal Declaration of Human Rights of 1948, the International Covenant on Civil and Political Rights of 1966, and the International Covenant on Economic, Social and Cultural Rights of 1966. Itaú Unibanco also adheres to the United Nations Global Compact, the Corporate Charter on Human Rights, the Women's Empowerment Principles (WEPs) proposed by UN Women and Global Compact, and the Ethos Institute's Business Charter on Human Rights and the Promotion of Decent Work, and the Brazilian Pact for the Eradication of Slave Labor, as well as the Corporate Standards of Conduct proposed by UN Free & Equal.

2. Scope and Objectives

This document applies to our business and our relationships with employees, clients, suppliers, and society, and is aimed at providing guidelines for preventing Human Rights risks we are exposed to and disclosing good practices. We are guided by recommendations by the United Nations (UN) and the International Labor Organization (ILO), which guide our actions related to critical topics, mitigation practices, remedy and monitoring and work with vulnerable groups (such as children, adolescents, indigenous people, migrants, women, black people, people with disabilities, LGBT+, and others).

3. The Bank's Policies

Respect for Human Rights is an essential element of Itaú Unibanco's policies and is associated with the best practices related to corporate governance, sustainable development, and social responsibility. Our Code of Ethics is, therefore, based on principles that support an organizational culture focused on valuing people, on strict compliance with rules and regulations and on a constant search for development.

Our Sustainability and Environmental and Social Responsibility Policy, in turn, is applied throughout the entire organization in Brazil; its principles are an integral part of our internal client and supplier review processes, and the way that relationships with internal stakeholders are managed. Respect for and protection of Human Rights, diversity, fight against child and slave-like labor and against criminal exploitation of prostitution and sexual exploitation of minors, climate change, biodiversity, natural resources, and environmental and social risk management are some of the topics addressed in this policy.

4. Implementation and Monitoring

Itaú Unibanco is committed to continually monitor and review the impact of its activities on Human Rights. Human Rights monitoring and supervision is implemented and performed by the Bank's business units, which must incorporate them into their standing policies and procedures. Internal Audit is charged of periodically monitor the way this process is implemented by the business units and draws on the external audit's work to review some of the processes. Specifically with regard to the Procurement Department, in addition to Internal Audit, which checks the compliance of internal processes, we carry out on site audits of our suppliers, prioritizing those deemed critical suppliers in terms of exposure to human rights violations.

Whistleblowing channels

We have whistleblowing channels qualified to identify and investigate practices contrary to this Commitment to Human Rights.



External Ombudsman's Office

The External Ombudsman's Office is part of the Itaú Unibanco client service system in Brazil and acts as a catalyzer of improvements and forum of last instance when a client is not satisfied with the solution offered by our regular channels, namely helpline, customer service center, or online complaint portal. In addition to seeking the best solution for each submitted request, the External Ombudsman acts directly on the Client Demand Management process with the goal of mobilizing the organization to identify the root causes for dissatisfaction among clients and develop action plans to ensure this process's effectiveness; constantly monitors performance using the strategies set out by special procedures and ombudsman committees, and implementing a relationship schedule with the local consumer protection system, standard-setting institutes, and civil society entities. The Ombudsman also contributes to the assessment of the client vision as part of the creation of new products and services, ensuring the compliance with the Consumer Protection Code.

Every six months, our External Ombudsman's Office prepares a report about the most critical complaints, case studies and action plans to improve client experience. This report is submitted to senior management and the Audit Committee, as well as the Central Bank. Our Ombudsman's Office publishes a biannual public report with the main evolution on the client relations front, on our institutional website (www.itaub.com.br). You can contact the External Ombudsman's Office through the email https://www.itaub.com.br/ouvidoria/ and telephone 0800 570 0011.

Internal Ombudsman's Office

To strengthen our commitment to ethics, we have an internal whistleblowing channel in place: the Internal Ombudsman's Office. Characterized by commitment, dialogue, transparency, owner mentality, integrity, and ethics, the purpose of the Internal Ombudsman's Office is to help employees resolve interpersonal conflicts and conflicts of interest in the workplace, unethical conduct, and practices contrary to the related institutional policies, such as, but not limited to, moral or sexual harassment, discrimination of all types of diversity, favoritism, behavior at odds with proper risk management, always based on three pillars: confidentiality, neutrality, and independence. The Internal Ombudsman's Office's activity is key to our building up an organization that values respect in all relationships and pursues its goals without diverting from the values in which we believe. The communication channels with the



Internal Ombudsman are available to all employees in the Itaú Unibanco's Code of Ethics and internal corporate portal.

Since 2017, this channel has been assisting employees also as a Risk channel under the Risk Culture program.

In 2018, the Ombudsman consolidated, through affirmative actions, the commitment to respect and disavowal of any type of discrimination, strengthening the employees' perception of the department as an open doors support team, where they can report any discomfort or feeling that something is contrary to expected behavior; the Ombudsman reports directly to the CEO, underpinning his or her independence.

As regards handling incidents in our Foreign Units, the Executive Committee has decided that these cases should be dealt with locally. Our employees in these units may report to the local Compliance and HR departments, which are the main reporting and guidance channels. The Compliance and HR departments are ready to receive complaints, engage the partner departments in the investigation whenever needed and assess the best way to handle and resolve conflict. It is worth mentioning that, if it is not possible to engage said departments, the Internal Ombudsman's Office may be called to help settle the conflict.

Supplier Reporting Channel

The purpose of the Supplier Reporting Channel in Brazil is to deliver an ethical environment for us and our suppliers. In this channel, suppliers may report any unethical conduct, illegal actions, or violations of our Code of Ethics and the Supplier Relationship Code, while ensuring full confidentiality, anonymity and non-retaliation. Suppliers can contact us via the email address forneceadores_relatos@itau-unibanco.com.br and telephone number 0800 723 0010.

Inspection Department

Itaú Unibanco's Inspection Department is responsible for the management and prevention of internal and external fraud in connection with the many products and services offered by the conglomerate. Its main roles and responsibilities include investigating, monitoring, and handling any cases identified/reported; internal and external investigations into internal and external fraud and employee misconduct; supporting and receiving reports received from our branch network and business areas, as well as from clients, service providers, and the public at large (if requested), via the email address inspetoria@itau-unibanco.com.br or telephone number 0800 723 0010,



available to all employees in Itaú Unibanco's Code of Ethics and internal corporate portal. These are safe channels, where anonymity is preserved to ensure that the identity or the complainant remains confidential and his or her report is handled with independence and impartiality.

In our foreign units, there are local channels for reporting and also the option to report any complaints directly to Brazil via the Inspection Department and Audit Committee channels. All channels are made available to employees in the Ethics Codes.

5. Current Guidelines

Diversity

Itaú Unibanco is committed to valuing diversity by respecting, guaranteeing and promoting equal opportunities for all, within a safe environment of mutual respect that fosters actual inclusion and ensures that everyone has the same opportunities.

Promoting diversity means respecting and providing equal treatment to clients, employees, stockholders, investors, suppliers, business partners and society in general irrespective of sexual orientation, race, color, ethnicity, gender, age, culture, religion, nationality, social or civil status, or disability, in addition to preventing all forms of discrimination, and encouraging uniqueness and equal treatment for all. Therefore, Itaú Unibanco adopts policies and practices aimed at ensuring decent work, business ethics and ethical partnerships, and the commitment to social responsibility.

Equal Treatment Among Employees and Third Parties

The issue of equal treatment is provided for in our Code of Ethics, and included in the following topics:

- **Work relations:** "We value our employees by respecting human rights and promoting social diversity. To this end, we adopt policies and practices to prevent and fight all kinds of discrimination, harassment, prejudice, and unworthy work conditions (such as child or forced labor)."
- **Professional attitude:** "It is necessary to promote relations based on cooperation and respect for dignity and for equal treatment, thus contributing to an environment prone to development and healthy interaction, aiming at maintaining a participatory and cordial climate." "

As part of this commitment, when a contract involves outsourced parties, we adopt measures to promote practices, such as: inclusion of specific contractual clauses to



ensure the compliance with labor legislation, as well as adherence to sustainability recommendations (e.g.: combating moral and sexual harassment or any form of discrimination, valuing, qualifying and developing employability of people with disabilities, and combating child, slave or slave-like labor).

Therefore, we understand that it is the responsibility of everyone to ensure equal treatment among employees and outsourced parties.

Stakeholder Engagement (Dialogue with internal and external stakeholders)

Itaú Unibanco assumes the commitment to keep the dialogue with its stakeholders open as a way of building up reputation, developing opportunities, reducing risks and bringing about new perspectives and innovation. We recognize that we are an important part of our society and that we are in apposition to impact and be impacted by society. Therefore, our engagement with employees, clients, stockholders, suppliers and society in issues related to Human Rights is essential. Our engagement translated through our dialogue with the many different stakeholders to take into account different points of view and needs, and to share our initiatives in order to learn and share the best practices for common benefits and value and to develop long-lasting relationships.

Education and Culture

Itaú Unibanco recognizes the human right to education and seeks to promote it with its employees and society, by focusing on projects to improve the Brazilian public education, on which it believes the bank`s activities may have a higher impact. Investment in education is any of the ley drivers of social transformation and a basic pillar of a country`s sustainable development. Itaú Unibanco also recognizes every person`s right to culture and leisure, and therefore promotes activities towards society, employees and clients, to help people exercise this right. Expanding the people`s contact with cultural diversity is the right way to open paths for social development.

Freedom of association

We guarantee our employees` rights to freedom of association as well as the absolute freedom for employees to take part in labor union activities, always recognizing the rights and prerogatives of those elected to executive positions in the unions pursuant to the current Brazilian legislation and the collective agreements for each professional category to which we are a party in our industry.



Any discrimination against unionized employees and/or representatives of unions of the professional category is barred and will subject the violator to applicable disciplinary sanctions.

To ensure the protection of this right and aiming at identifying any misconducts or infringement of the right to free association with labor unions, Itaú Unibanco has internal channels that can be used by employees who may feel disadvantaged, persecuted or discriminated against due to exercising their option, ensuring the right to anonymity, if they so require.

Such reporting channels include email, videos, electronic media, advertising totems, the in-house magazine and our Corporate Portal, where human resources policies are detailed in our regulations for personnel (RPs). In addition, employees have a call center at their disposal, which they may contact to clear any doubts.

Itaú Unibanco in Brazil has 1,438 active employees with roles in the various boards of directors of the labor unions representing them. As enshrined in the collective labor agreement for bank employees, 890 employees work full time for these unions. In addition, we allow the unions to hold membership campaigns and, when requested, to hold meetings between the union entities, our managers and employees, with a view to seeking negotiated solutions in a respectful manner and in line with ethical principles.

In the Foreign Units, the free trade union association is in compliance with applicable local legislation and in line with the ethical principles of the Code of Ethics.

Privacy

Itaú Unibanco respects the privacy of clients, suppliers, employees, society and other publics with which it relates, and keeps confidential their registers, information, operations and contracted services.

Considering the sensitivity of this issue, we are committed to ensuring clients, employees, suppliers and society a safe and reliable environment. We invest in infrastructure, technology and human resources to prevent information privacy violations, based on policies, processes, procedures and guidelines covering several fronts of action. In addition to continually investing in security, we keep in place internal processes to ensure an ethical use of data, aligned with standing laws and regulations. We are also adapting to the new general personal data protection law.

We timely and effectively monitor and address any type of attack and security incidents, by managing all security tools with certified staff specialized in many different technologies. Access to systems and resources are managed efficiently, following the



changes necessary to maintain security for accessing and changing systems and information.

We work together with the business and technology departments to maintain solutions and product architecture with the highest degree of security, following the trends of the digital world market. Our employees take part on ongoing awareness campaigns and training, in-person or online, covering issues related to information confidentiality, integrity and availability, which compose Information Security. These campaigns are shown through emails, the corporate portal, e-learning, elemedia, and social media to employees and clients.

The suppliers contracted by the bank are classified based on several criteria, such as type of information that can be accessed, supplier size, type of service provided, sensitivity of information addressed and type of access to bank systems, if necessary. Depending on the classification, the requirements for protection of the supplier's infrastructure range from providing security recommendations to on-site control validation informed by the supplier, and monitoring possible corrections and improvements implemented by suppliers, when necessary. As regards suppliers in Brazil that handle confidential information, we scan each supplier's environment on a monthly basis and monitor corrections of possible vulnerabilities identified. Contracts entered into by the bank and third parties include confidentiality clauses that must be followed by the supplier.

Child and Slave-Like Labor

Itaú Unibanco recognizes that all forms of slave-like labor are serious violations of Human Rights, as well as the use of child labor in disagreement with legislation of the jurisdictions where we operate. The organization, therefore, addresses the issue by seeking to mitigate the risks of this type of violations as a result of our operations, a commitment that is reinforced by the reinforcing the principle "Respect for and protection of human rights, by promoting diversity, financial inclusion and the fight against child labor, labor analogous to slavery, criminal exploitation of prostitution and sexual exploitation of minors", included in our Sustainability and Environmental and Social Responsibility Policy.

Moral and Sexual Harassment

We at Itaú Unibanco do not tolerate moral or sexual harassment in the workplace. This issue is addressed in our Code of Ethics in the Principle of Excellence, as it being



unacceptable to practice or tolerate moral or sexual harassment, which cause damage to the personal integrity of those who become victims, result in legal accountability, and are damaging to the work environment.

Itaú Unibanco has an Internal Ombudsman's Office channel, aimed at helping preventing and resolving interpersonal conflicts in the work environment, as well as receiving, filing, analyzing and investigating any suspected or actual facts or practices contrary to the institution's ethical guidelines, such as the moral and sexual harassment.

Any cases investigated and considered legitimate are subject to disciplinary measures, guided by Itaú Unibanco's Policy – Disciplinary Standards.

At the Foreign Units, occurrence of harassment can be reported: (i) to the local Compliance Officer; (ii) using the channels made available at the head office, in compliance with Code of Ethics guidelines; or (iii) using any other channel made available in each Unit.

Health & Safety

Itaú Unibanco recognizes that enjoying physical and mental health is vital to live a life consist with human dignity. To preserve a healthy, comfortable work environment, Itaú Unibanco promotes actions that provide safe and healthy conditions, physical accessibility, and prevent accidents and mitigate environmental risks, by establishing assessment and control measures, such as: Readjustment and Return to Work Support Program, Professional Rehabilitation Program, *Meu Tempo* (My Time) Program, *Fique Ok* (Be OK) Program, occupational and periodical medical examinations integrated with the healthcare plan, Parental Support Policy, and ergonomic evaluations of the workstations. In addition to these initiatives, Itaú Unibanco encourages and supports adopting habits conducive of wellbeing. Against this backdrop, we disseminate the ideal that self-care is a career driver of any professional. To do this, we grant a series of benefits and have in place standards and procedures to encourage our employees' pursuit for this balance: medical and dental care, gyms in the administrative centers and access to a nationwide gym chain (Gympass), *Fique Ok* (Be OK) Program, outpatient clinics in the administrative centers that provided multiprofessional health care, Equilibrium Program (stress control training), and flu vaccination.

Initiatives carried out by Itaú Unibanco to promote safety in the workplace in Brazil also include: the Internal Accident Prevention Weeks (local acronym SIPATs), accident investigations with preventive actions that analyzes causes of accidents to further work on prevention and identification of other situations; online training on occupational accident and disease prevention; Workstation Evaluation aiming at enhancing employee



comfort (including adapting the work conditions of our PWD employees); and the Environmental Risk Prevention Program (local acronym PPRA), which rates the performance of the business units to verify physical, chemical and biological hazards in the environment and proposes necessary adaptations for eliminating exposure to such risks; and Preparation of Reports on Unhealthy or Hazardous Conditions, on-site inspections made at specific business units.

Compensation

To ensure employees have fair working conditions and equitable compensation, Itaú Unibanco promotes meritocracy and transparency. In order to actively prevent any form of discrimination, Itaú Unibanco has compensation policies and processes that respect diversity and our Personnel Department monitors compliance through joint meetings to avoid discrimination and prejudice in connection with compensation.

Compensation principles and practices are consolidated in a Compensation Policy so as to attract, reward, retain and motivate management members and employees to run the business in a sustainable manner. We adopt compensation and benefit strategies based on parameters such as: salary surveys in the market; responding to industry surveys; and attend specialized forums.

Corruption Prevention

Itaú Unibanco has a Corruption Prevention Corporate Policy enforceable in the entire organization that strengthens our commitment to proactively cooperate with local and international initiatives for the prevention and suppression of corruption, in all its forms, for the purpose of preventing our involvement in illicit activities, protecting our reputation and image among employees, clients, strategic partners, suppliers, service providers, regulators and society. Based on a governance framework focused on transparency, we strictly comply with the rules and the relevant regulations and cooperate with law enforcement and judicial authorities. We also continuously seek to align ourselves with local and international best practices to prevent and fight illicit acts, through investments and training of our employees on an ongoing basis.

In order to be compliant with the corporate policy guidelines, we have established a program to prevent and fight illicit acts based on the following pillars:

- Customer Identification Process;
- “Know Your Customer” (KYC) Process;
- “Know Your Partner” (KYP) Process;

- “Know Your Supplier” (KYS) Process;
- “Know Your Employee” (KYE) Process;
- Risk Assessment of New Products and Services;
- Transaction Monitoring;
- Reporting Suspicious Transactions to Regulators and Authorities; and
- Training.

This program is applicable to us and our subsidiaries in Brazil and abroad. The governance of prevention and detection of illegal activities is carried out by the Board of Directors, the Audit Committee, Compliance and Operational Risk Committees, and the Anti-Money Laundering Committee.

Embargoes

The international community has been increasingly attentive to acts or behaviors of countries, governments, groups, companies, or individuals that breach the universal principles of peaceful coexistence, either in connection with civil or military conflicts, terrorism activities and its financing, or those related to illegal or condemnable practices, such as drug trafficking, exploiting prostitution, slave labor, corruption, frauds and money laundering, among others.

In reprisal for these economic, political, social or warlike actions, some jurisdictions or international bodies have imposed embargoes, which consist of the full or partial prohibition to do business with certain countries, groups, individuals or companies.

Itaú Unibanco adopts embargo guidelines established by the Office of Foreign Assets Control (OFAC), the United Nations (UN), and the European Union Council.

6. Mitigation and Remediation

6.1 For employees

Fique OK (Be OK) Program

Itaú Unibanco provides its employees and their family members with a personal support program known as *Fique Ok*, which aims at embracing employees having a difficult moment in life by guiding them to better manage personal, family and professional conflict situations.



This service offers advice around the clock by a multidisciplinary team of psychologists, social workers, lawyers, nutritionists, physiotherapists, personal trainers, a pet consultant, and a financial coach. The service is offered by telephone and is available throughout Brazil, free of charge and with a guarantee of confidentiality. The service is offered by telephone and is available throughout Brazil, free of charge and with a guarantee of confidentiality.

Parental Support Programs

This program is designed to foster women's preventive, behavioral and reproductive health initiatives, in addition to promoting equal opportunities, reinforcing our vision and our statements on equality and welcoming stance in situations that affect the female population in particular:

- Baby on Board: in-class or remote course for pregnant female employees and their partners, as well as couples about to adopt a child. The subjects covered focus on basic, necessary advice on what to do during the first months of pregnancy, such as nutrition of the mother-to-be, care for the newborn, psychological issues, etc.;
- Mom's corner: a space for pumping and storing breast milk during working hours; and
- Baby at home: visits from a specialist nurse to the employee's home in the first week after birth to advise on breastfeeding and initial post-natal care.

The programs are available to employees working in Brazil, at the São Paulo and Greater São Paulo units.

Parental Support Policy

The Parental Support Policy outlines the benefits for pregnant women and homosexual couples after a child is born or adopt, in order to meet the needs of the possible family setups. For return to work readjustment purposes, mothers are entitled to reduced working hours during the first month after the end of the maternity leave.

In 2018, the Executive Committee also approved that the performance evaluation of employees who are on Maternity Leave for at least one month shall be based on the period worked and not the entire service period, thus preserving goods scores and, as a result, the women's eligibility to career acceleration programs, educational allowances, and promotions. Additionally, profit sharing will be fully paid rather than proportionally to



the period worked. These actions show the progress of the equal opportunities for men and women agenda and the relevant policy applies to all Itaú Unibanco units in Brazil.

Extended Paternity Leave

Strengthening our commitment to valuing human rights, Itaú Unibanco, as a citizen company, has adhered to the practice of extending paternity leave for 15 more days. Thus, in addition to the five-day leave already legally required, another 15 days may be requested, also applicable to adoption cases. The program was launched in January 2017 and this policy applies to all Itaú Unibanco units in Brazil.

Meu Tempo (My Time) Program

This project was designed to prepare employees for a healthy and structured career transition. Topics addressed are focused on self knowledge, career alternatives, health prevention and financial and personal planning.

6.2 For suppliers

Relationship with Suppliers Code

This document supplements the Code of Ethics and aims at governing interactions between employees and suppliers through a statement of values that define the expected behavior in commercial relationships, with the purpose of achieving the same transparency, legality, quality and reliability we have with our clients, also in the interactions with our suppliers and service providers.

As of the launch of this document, in November 2016, electronic acceptance of these conditions is required from all suppliers.

Formal Supplier Contract Process

Supplier contracts include specific clauses on the proper monitoring of issues related to human rights, labor obligations, safety and occupational health standards, environmental and social issues, compliance with environmental laws and regulations, the anticorruption regulation, liability for damages and information security, and other rules applicable to our suppliers and their supply chain. If any irregularities are detected, penalties and action plans may be applied to help a supplier solve the problem, or, in certain situations, they may lead to suspension or termination of the respective contract.

We conduct periodically an external audit of selected suppliers on the protection of and respect for human rights, as well as environmental and social issues, and if any irregularities are identified, action plans may be developed to help a supplier solve the problem or, in certain situations, penalties are applied, possibly leading to suspension or termination of the respective contract. These practices apply to all Itaú Unibanco units in Brazil.

6.3 For clients

Credit

In the environmental and social risk analysis process carried out for granting and formalizing credit for companies, the practices carried out by the company are checked out through surveys and a questionnaire of self-declaration, and in the event we find activities considered by Itaú as prohibited—use of forced labor; used of child labor not in accordance with the relevant laws and regulations; and exploiting prostitution, including child prostitution—the client is blocked in our systems, preventing it from having any relationship with the bank.

Clients involved in the activities listed above are identified by tracking media reports or through lists issued by official bodies. If a client has been proven to be involved in such activities, the client is blocked in the system and becomes unable to conduct any new credit transactions.

In 2018, 37 clients had their credit transactions blocked due to indications that they were engaging in activities that are considered prohibited; in these cases, we only resume a credit relationship if the client successfully proves it has changed its practices and ensures that its name is excluded from the lists issued by official bodies.

Investments

Itaú Asset Management has a proprietary methodology that integrates environmental and social variables into traditional company valuation models. The assessment addresses eight multi-sector dimensions, of which four are related to the stakeholders relations— “Workers relations”, “Community relations”, “Client relations” and “Supplier relations”, and four are related to environmental dimensions—“Water, energy and materials”, “Biodiversity and land use”, “Waste management”, and “Climate change”. It prioritizes the critical dimensions for each sector when assessing the companies. Part of this methodology consists of engaging with investee companies to establish a constructive dialogue, have an in-depth understanding of the Environmental,



Social and Governance (ESG) issues, and disseminate the best practices, as well as to mitigate possible risks. Itaú Asset Management takes into account these ESG issues to exercise the voting rights at general stockholders' meetings, and has struck partnerships with independent expert consultants.

These practices apply to all operations in Brazil.

6.4 For society

Working Together with the Community and Government

Our strategy relates to social development initiatives, such as education, culture, sports, urban mobility, for the elderly, and entrepreneurship, which are delivered to all communities in which we have operations in Brazil. These initiatives are extended to the media, opinion leaders, the market and several social organizations. We also work together with various levels of the Government to improve public policy models in Brazil.

We have a program to identify needs and opportunities in the regions where our large operations and business centers are located. This process enables us to study ways to work together with the leaders of the local communities, organized civil society and government agencies for supporting and implementing projects in these locations.

We maintain contact with government entities in order to collaborate with the construction of public policies focused on the interests of the organization and society. The work with public agencies is based on ethics, responsibility, transparency, morality and legality principles, ensuring democracy and respect to the laws of Brazil and the principles set forth in our Code of Ethics.

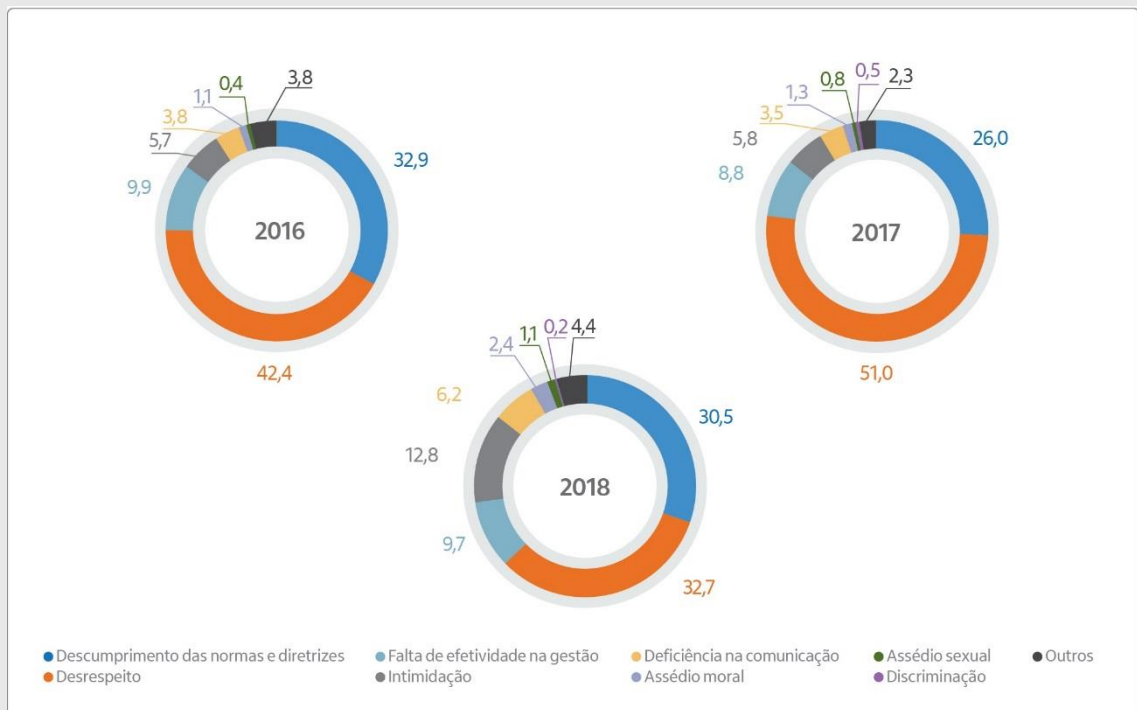
At the federal level, we monitor the progress of legislative propositions that are deliberated on in the National Congress: in 2018 we monitored approximately 3,000 propositions. We also conducted several interactions with lawmakers and government officers with remarkable participation and expertise in areas such as security, consumer rights, urban mobility, fiscal and tax issues and the environment. At state and municipal levels, we follow closely more than 8,800 discussions of legislative propositions that deliberate on State Legislatures and several City Councils.

6.5 Whistleblowing channels

Internal cases

Out of the 761 complaints received by the Internal Ombudsman's Office channel in 2017, 44% were considered legitimate, whereas in 2018, of the 1,069 complaints investigated, 42% were considered legitimate. The main behaviors reported in such legitimate cases for both years were: disrespect, violations of from the bank's standards and guidelines, lack of management effectiveness, bullying, communication deficiency, moral harassment, sexual harassment, and discrimination.

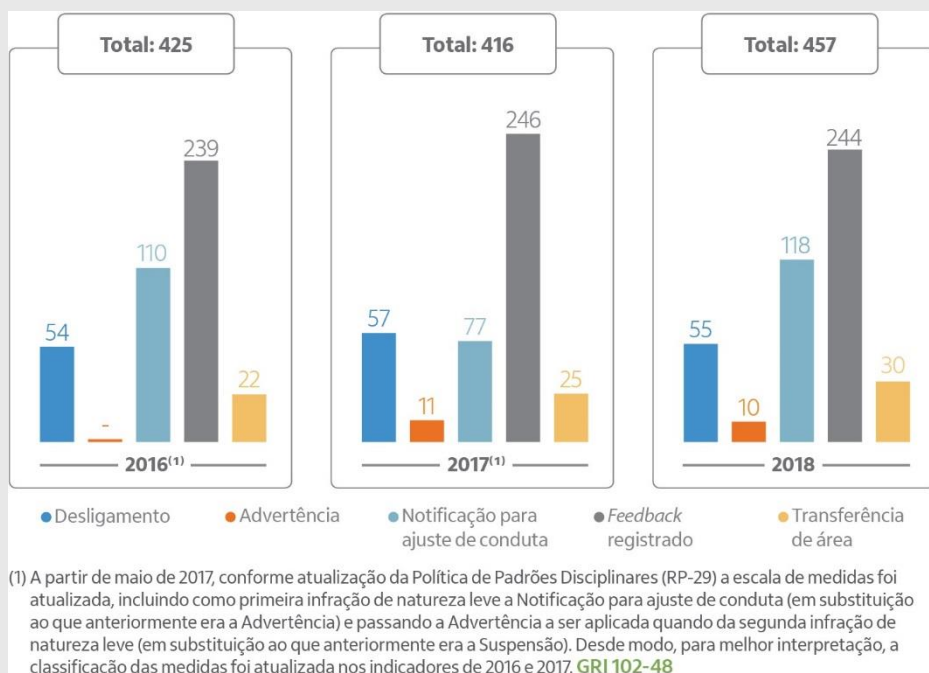
Behaviors identified in the complaints (%)



In 2018, we received 1,871 complaints. Of this total complaints, 1,595 were solved in the same year and 276 were still being handled at the end of 2018.

In order to guide and discipline employees who have not complied with the principles of the Company's Code of Ethics and rules and to minimize related risks, 457 guiding/disciplinary actions were implemented for those involved in the complaints investigated and considered legitimate, as shown in the table below.

Guiding and Disciplinary Actions Taken



We also have an External Ombudsman's Office that serves as a communication channel where our clients can file criticism and complaints. However, cases of alleged discrimination are taken to courts or to other customer protection services. In 2018, 16 legal actions related to discrimination involving our clients were terminated, of which eight were settled and in the remaining ones, the court awarded sentences pointing to the unfair treatment received by certain clients and sentencing us to paying compensation for pain and suffering. No legal actions related to discrimination were recorded in our Latam units.

All cases are carefully monitored and in the case of confirmed incidents, the responsible departments are involved to develop action plans so as to prevent similar incidents in the future.

7. Final Considerations

At Itaú Unibanco, ethics and respect to people are above everything. For us, any act that breaches the rights of our employees, clients, suppliers, and other stakeholders is unacceptable and intolerable.

We seek to develop our human rights diligence by continuously improving our risk control mechanisms, actions to mitigate and repair any harming impacts, in order to advance our practices and prevent new cases from arising. For us, protecting the

fundamental rights inherent in each individual is a daily commitment we make to ensure Itaú Unibanco's ethics, continuity and trustworthiness.

8. Control Information on the Commitment to Human Rights

In 2014 we published the first version of this document and formalized our commitment to respect for human rights. In the following year, 2015, we consolidated our first Due Diligence processes, in partnership with an independent expert third party, which enabled us to identify our improvement needs and prepare improvement plans. As a result of this work, in 2016 we improved the human rights management in our institution, and prepared a more comprehensive and detailed version of this document.

In 2017, our second Due Diligence process was carried out to assess actual or potential impacts on human rights, through our activities or as a result of our commercial relations, and also to assess human rights management, monitor the compliance with our commitment guidelines.

The Due Diligence process comprised the following stages: (1) Research and mapping: analysis of the Human Rights Commitment, policies, processes, products, services and interviews with those involved; (2) Definition of priorities: evaluation of impacts, risks and identification of improvement opportunities; (3) Analysis of challenges of the UN Guiding Principles: identification of the challenges associated to the UN Guiding Principles; and (4) Conclusions and recommendations: recommendations for improving the Human Rights management process.

In 2018, based on the diagnosis of the second process we identified some priority issues, we analyzed the governance, in the context of our Sustainability Committee, and after completing this mapping, we formed workgroups by theme and designed mitigation, remediation action plans and monitoring agendas focused primarily on risk management. Our priorities were: employee discrimination, client discrimination, suppliers, and occupational health and safety.

We will work preparing improvement plans, developing targets, and mitigation and remediation actions mainly focused on the management of risks already highlighted in these topics. Our commitment is to protect the fundamental rights inherent in each individual counting on specialized partnerships, the incorporation of the best market practices and instructions from bodies that determine social responsibility guidelines.



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